

1 Michael Beede, Esq.  
2 Nevada Bar No. 13068  
3 James W. Fox, Esq.  
4 Nevada Bar No. 13122  
5 **THE LAW OFFICE OF MIKE BEEDE, PLLC**  
6 2470 St. Rose Pkwy, Suite 201  
7 Henderson, NV 89074  
8 T: 702-473-8406  
9 F: 702-832-0248  
10 *eservice@legallyv.com*  
11 *Attorneys for Defendant/Counter-Claimant, KE Aloha Holdings, LLC*

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13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 JAMES W. PENGILLY, a Nevada resident,

16 CASE NO. 2:14-cv-01463-RFB-NJK

17 Plaintiff,

18 v.

19 NEVADA ASSOCIATION SERVICES,  
20 INC., a Nevada corporation; MARK A.  
21 STUHMER, a Nevada resident; DOUGLAS  
22 L. CROOK, a Nevada resident; BILL  
23 BLANCHARD, a Nevada resident; KENNETH R. SAILLEY, a Nevada resident;  
24 ERIKA GEISER, a Nevada resident; KE  
25 ALOHA HOLDINGS, LLC, a Nevada limited  
26 liability company; DOES I through X,  
27 inclusive; ROE CORPORATIONS I through  
28 X, inclusive,

Defendants.

KE ALOHA HOLDINGS, LLC, a Nevada  
limited liability company,

Counter-Claimant,

v.

JAMES W. PENGILLY, an individual;  
AMANDA M. PENGILLY, an individual;  
JAMES W. PENGILLY and AMANDA M.  
PENGILLY, as Trustees of the James W.  
Pengilly Trust, dated September 22, 2003;  
GREEN TREE SERVICING, LLC, a  
Delaware limited liability company; UNITED  
STATES INTERNAL REVENUE SERVICE;

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND BRIEFING  
SCHEDULE ON DITECH FINANCIAL  
LLC'S MOTION TO AMEND REPLY  
TO COUNTERCLAIM [ECF NO. 165]**

1 BANK OF AMERICA, National Association;  
2 and any and all other persons unknown  
3 claiming any right, title, estate, lien or interest  
4 in the Property adverse to the Plaintiff's  
ownership or any cloud upon Plaintiff's title  
thereto (DOES 1 through 10, inclusive),

5 Counter-Defendants.

6 GREEN TREE SERVICING, LLC, a  
7 Delaware limited liability company,

8 Counter/Cross-Claimant,

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10 KE ALOHA HOLDINGS, LLC; NEVADA  
11 ASSOCIATION SERVICES, INC., a Nevada  
12 corporation; WEST CHARLESTON LOFTS  
13 OWNERS ASSOCIATION, a domestic non-  
profit corporation; and DOES I through X,  
inclusive,

14 Counter/Cross-Defendants.

15 COMES NOW, Defendant/Counter-Claimant/Counter/Cross-Defendant, KE Aloha  
16 Holdings, LLC ("KE Aloha") by and through its attorneys of record, Michael Beede, Esq. and  
17 James W. Fox, Esq. of The Law Office of Mike Beede, PLLC; and Counter-  
18 Defendant/Counter/Cross-Claimant, Ditech Financial LLC f/k/a Green Tree Servicing, LLC  
19 ("Ditech"), by and through its attorney of record, Colt B. Dodrill, Esq. of the law firm of Wolfe  
20 & Wyman LLP, and hereby stipulate as follows:

1. This matter concerns title to real property commonly known as 11411 Allerton Park  
21 Drive, Unit #411, Las Vegas, NV 89135 (the "Property").
2. On March 12, 2018, Ditech filed its Motion to Amend Reply to Counterclaim (Second  
23 Request) [ECF No. 165]
3. The Court set a deadline of March 26, 2018 to file any opposition to Ditech's Motion.
4. The parties hereby stipulate to continue the deadline for KE Aloha to file an Opposition  
26 to Ditech's Motion [ECF No. 165] by two (2) weeks, until the date of April 9, 2018.

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1        This is the parties' first request for a modification of the briefing schedule and it is not  
2 intended to cause any delay or prejudice to any party.

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4        Dated this 26<sup>th</sup> day of March, 2018.  
THE LAW OFFICE OF MIKE BEEDE, PLLC

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6        /s/ Michael Beede, Esq.  
Michael Beede, Esq.  
7        Nevada Bar No. 13068  
James W. Fox, Esq.  
8        Nevada Bar No. 13122  
2470 St. Rose Pkwy, Suite 201  
9        Henderson, NV 89074  
10      *Attorneys for KE Aloha Holdings, LLC*

Dated this 26<sup>th</sup> day of March, 2018.  
WOLFE & WYMAN LLP

/s/ Colt Dodrill, Esq.  
Colt B. Dodrill, Esq.  
Nevada Bar No. 9000  
6757 Spencer Street  
Las Vegas, NV 89119  
11      *Attorney for Ditech Financial LLC f/k/a*  
12      *Green Tree Servicing, LLC*

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14  
15      **ORDER**

16      **IT IS SO ORDERED.**

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21      **RICHARD F. BOULWARE, II**  
22      United States District Court

23      DATED: March 27, 2018.

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**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and that I am not a party to, nor interested in, this action. On the 26<sup>th</sup> day of March, 2018, I did cause a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE ON DITECH FINANCIAL LLC'S MOTION TO AMEND REPLY TO COUNTERCLAIM [ECF NO. 165]** to be served upon each of the parties involved in this litigation via electronic service through the CM/ECF Electronic Filing System:

/s/ Allison Zeason  
An Employee of The Law Office of Mike Beede, PLLC